

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re Flint Water Cases

No. 5:16-cv-10444-JEL-EAS

HON. JUDITH E. LEVY

MAG. ELIZABETH A. STAFFORD

**DECLARATION OF THEODORE J. LEOPOLD IN SUPPORT OF
CLASS PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS
SETTLEMENT WITH VNA DEFENDANTS**

Pursuant to 28 U.S.C. § 1746, I, Theodore J. Leopold, declare as follows:

1. I am a partner of the law firm Cohen Milstein Sellers & Toll PLLC and I, along with Michael L. Pitt of the law firm Pitt McGehee Palmer Bonanni & Rivers, P.C., serve as Court-appointed Co-Lead Class Counsel in the above captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. Attached as Exhibit A is a true and correct copy of the Amended VNA Settlement Agreement ("VSA") signed by all parties.

3. Attached as Exhibit B is a true and correct copy of the Declaration of Markeita Reid in Support of Class Plaintiffs' Motion for Final Approval.

4. Attached as Exhibit C is a true and correct copy of the Proposed Order.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on September 6, 2024
Palm Beach, Florida

/s/ Theodore J. Leopold
Theodore J. Leopold

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was filed with the U.S. District Court through the ECF filing system and that all parties to the above case were served via the ECF filing system on September 6, 2024.

Dated: September 6, 2024

By: /s/Theodore J. Leopold
Theodore J. Leopold
COHEN MILSTEIN SELLERS
& TOLL PLLC
11780 U.S. Highway One, Suite
N500
Palm Beach Gardens, FL 33408
Telephone: (561) 515-1400
tleopold@cohenmilstein.com